

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

Sensa Verogna,

Plaintiff,

v.

Twitter, Inc.,

Defendant.

Civil Case No. 1:20-cv-00536-SM

**TWITTER, INC.’S OBJECTION TO  
PLAINTIFF’S MOTION TO DECLARE  
TWITTER A “STATE ACTOR” UNDER LAW**

Defendant, Twitter, Inc. (“Twitter”), by and through its undersigned counsel, Orr & Reno, Professional Association, respectfully objects to Plaintiff’s Motion to Declare Twitter a “State Actor” Under Law [Doc. 6]. In support of its objection, Twitter submits herewith Twitter, Inc.’s Memorandum of Law in Support of Its Objections to Plaintiffs’ Motions for Declaratory Relief.

WHEREFORE, the Defendant, Twitter, Inc., respectfully requests that this Honorable Court:

- A. Deny Plaintiff’s Motion to Declare Twitter a “State Actor” Under Law; and
- B. Grant such other and further relief as the Court deems just.

Respectfully submitted,

**Twitter, Inc.**

By its attorneys,

Dated: June 12, 2020

By: \_\_\_\_\_ /s/ *Jonathan M. Eck*  
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**CERTIFICATE OF SERVICE**

I, Jonathan M. Eck, certify that on this date service of the foregoing document was made upon the Plaintiff, *pro se*, via email.

Dated: June 12, 2020

\_\_\_\_\_ /s/ *Jonathan M. Eck*  
Jonathan M. Eck, Esq. (NH Bar #17684)